

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ROLAND C. ANDERSON,	)	Civil Action No. 06-669 JJF
	)	
Plaintiff	)	
	)	
v.	)	
	)	
GENERAL MOTORS CORPORATION,	)	
	)	
Defendant.	)	
	)	

**AFFIDAVIT**

Diane Graham, being first duly sworn and of lawful age, hereby states as follows:

1. My name is Diane Graham. I am of lawful age and I am competent to testify to the matters set forth in this Affidavit.
2. I have served as the People Systems Manager for General Motors Corporation's ("GM") Wilmington Assembly Plant since 2004. I have personal knowledge of the facts stated herein and if called to testify as a witness in this action, I would testify truthfully and competently to each of the following facts set forth in this Affidavit.
3. GM has a written policy against discrimination. This written policy is communicated to employees through postings and letters, and is part of the collective bargaining agreement with the UAW.
4. GM and UAW are parties to a national collective bargaining agreement and the local UAW chapter and GM are also parties to a local collective bargaining agreement. Both collective bargaining agreements govern the hours, wages, working conditions and other terms and conditions of employment of bargaining unit employees employed at GM's plant.

5. As the People Systems Manager, I supervise the employees in the human resources department. These employees are trained to be professional and courteous to anyone that contacts GM. These employees are also trained regarding GM's policies against discrimination.

6. I have personally contacted each human resources employee and no employee recalls speaking with plaintiff in March or April 2005. Additionally, no human resources employee has told any caller or applicant he or she is "all washed up."

7. GM's Wilmington facility was not hiring, advertising for or accepting applications for new hourly production employees at any time from 2000 to present. Further, GM hired no new hourly production employees in 2004 or 2005. All employees with seniority dates of 2000 or 2001 were transferred from other GM facilities to Wilmington.

8. GM's Wilmington facility did not hire, advertise for, or accept applications for new production employees in 2006 or 2007. However, in 2006, GM transferred seven production employees from GM facilities that it was divesting itself of to Wilmington.

9. GM's Wilmington facility has recalled no employee from layoff status from 2005 through 2007.

10. Attached to this affidavit are copies of the seniority list for November 6, 1999 through November 5, 2007.

11. Further Affiant sayeth not.



Diane Graham

STATE OF DELAWARE     )  
                                      ) SS.  
COUNTY OF \_\_\_\_\_ )

On this 6<sup>TH</sup> day of December, 2007, before me appeared Diane Graham, to me personally known, who being by me duly sworn, did state that the statements made in this Affidavit are true to the best of her knowledge and belief.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal in the County and State aforesaid, the day and year last above written.

James B. Carley  
Notary Public

My Commission Expires:  
  
\_\_\_\_\_

**JAMES B. CARLEY**  
**NOTARY PUBLIC**  
**STATE OF DELAWARE**  
**My commission expires Nov 7, 2011**

James B. Carley 12/6/07

Name	Local Seniority Date	Corporate Seniority Date	Occupation Code	Status
Wylie,Penny A	11/06/1999	11/06/1999	TM	A
Maher,Terrence E	11/06/1999	11/08/1999	TM	A
Benningfield,Earl F	11/08/1999	11/08/1999	TM	A
Brown,Bonni G	11/08/1999	11/08/1999	TM	A
Marshall,Kiesha Nicole	11/08/1999	11/08/1999	TM	A
Robinson,Wayne E	11/08/1999	11/08/1999	TM	A
Seward,Adrienne L	11/08/1999	11/08/1999	TM	A
Davis,Robert J	11/20/1999	11/20/1999	TC	A
Anderson,Nancy Marie	11/21/1999	11/21/1999	TM	A
Bachman,Kenneth Scott	11/21/1999	11/21/1999	TM	A
Spence,Helen Jacklyn	11/21/1999	11/21/1999	TM	A
Gregg,Paul	11/24/1999	11/24/1999	90	A
Kelly,Carlton D	01/18/2000	01/18/2000	TM	A
Vilichka,Maria A	01/18/2000	01/18/2000	TM	A
Kmiecniak,John T	01/31/2000	01/31/2000	TM	A
Amato,Michael Paul	02/07/2000	02/07/2000	TM	A
Plessek Jr,Thomas	02/07/2000	02/07/2000	TM	A
Munoz,David	02/09/2000	02/09/2000	TM	A
Rawls,Nick D	02/14/2000	02/14/2000	TM	A
Dorsey,Ibrahim A	03/27/2000	03/27/2000	TM	A
Clifton,Shanta	06/12/2000	06/12/2000	TM	A
Ramalho Jr.,Manuel Z	10/02/2000	10/02/2000	TM	A
Allmond,Al-nisa C	10/09/2000	10/09/2000	TM	L
Carter,Sabrina J	12/19/2000	12/19/2000	TM	L
Elliott,Ryan Ray	12/19/2000	12/19/2000	TC	A
Stefanowicz,John Walter	12/19/2000	12/19/2000	TC	A
Shortridge,Joann Lillian	01/15/2001	01/15/2001	TM	A
Sinkler,George J	01/15/2001	01/15/2001	TM	L
Brown,Aaron B	03/07/2001	03/07/2001	TM	L
Fryer,Gail Y	08/21/2006	08/21/2006	TM	A
Fryer,Vincent B	08/21/2006	08/21/2006	TM	A
Smith,Frank	08/21/2006	08/21/2006	TM	A
Wells,Chauncey	08/21/2006	08/21/2006	TM	L
Williams,Kenneth	08/21/2006	08/21/2006	TM	A
Wright,Tara Y	08/21/2006	08/21/2006	TM	A
Lawson,Fredrick	09/11/2006	09/11/2006	TM	L